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August 14, 1998

BY HAND

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

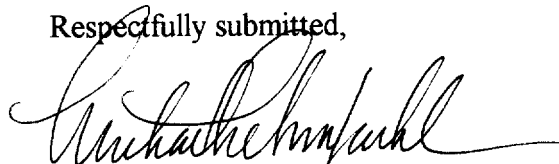
**Re: In the Matter of Implementation of Section 255 of the
Telecommunications Act of 1996, Access to
Telecommunications Services, Telecommunications
Equipment, and Customer Premises Equipment by
Persons with Disabilities, WT Docket No. 96-198**

Dear Ms. Salas:

Submitted herewith, on behalf of Uniden America Corporation, is an original and nine copies of its Reply Comments in the above referenced proceeding.

Kindly refer any questions regarding this matter to the undersigned.

Respectfully submitted,



Michael J. Lehmkuhl
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Enclosure

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

AUG 14 1998

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of

Implementation of Section 255 of the
Telecommunications Act of 1996

Access to Telecommunications Services,
Telecommunications Equipment, and
Customer Premises Equipment by Persons
with Disabilities

WT Docket No. 96-1 98

REPLY COMMENTS OF
UNIDEN AMERICA CORPORATION

Uniden America Corporation ("Uniden"), by its attorneys and pursuant to Section 1.415 of the Commission's Rules, hereby submits its reply comments in the above captioned proceeding.

Uniden supports the FCC's authority to promulgate its own rules in this proceeding', rather than merely adopting those of the Architectural and Transportation Barriers Compliance Board (hereinafter, "Access Board" or "Access Board's Guidelines")². Uniden believes that it is important that telecommunications manufacturers have one clearly defined set of rules to follow. Because the Commission already regulates certain standards for telecommunications

¹ *Access to Telecommunications Services, Telecommunications Equipment, and Customer Premises Equipment by Persons with Disabilities - Notice of Proposed Rulemaking*, FCC 98-55, released April 20, 1998, ("NPRM").

² *Telecommunications Act Accessibility Guidelines; Final Rule*, 63 FR 5607 (1998); see also, 36 CFR Part 1193.

manufacturers, and because the Access Board's Guidelines are too subjective, rules promulgated by the Commission in this area would eliminate confusion and offer uniformity.

In its comments in this proceeding, Uniden also asked that any complaint process procedures be reasonable and include safeguards to prevent abuse of process. Further, Uniden demonstrated that, while it generally supports the Commission's role in arbitrating consumer complaints under Section 255, there is no statutory or other basis for the Commission's proposal to impose damages as a remedy in complaint proceedings against non-common carriers under Sections 207 and 208 of the Communications Act of 1934, as amended.

Upon review of the many comments received in this proceeding, Uniden would like to address two aspects of the Commission's role in this proceeding. First, Uniden believes that in the interests of preventing conflict and confusion in this area, the FCC is the most qualified agency to promulgate regulation. Second, Uniden supports the Commission's efforts to define the "readily achievable" standard within the context of telecommunications and believes that cost recovery and market considerations are an integral part of any inquiry into the "readily achievable" standard. While Uniden supports the FCC's efforts, however, it also asks the Commission to adopt others' views that would allow manufacturers some discretion in incorporating accessibility features across products within a product line.

**THE FCC IS THE PROPER AGENCY TO PROMULGATE ACCESSIBILITY
RULES WITHIN THE CONTEXT OF
TELECOMMUNICATIONS PRODUCTS AND SERVICES**

As Uniden set forth in its original comments, the FCC is the expert agency in such matters as telecommunications equipment and services. While the Access Board's Guidelines are a good

starting point, in the regulated telecommunications industry, only the FCC is uniquely qualified to craft implementing regulations. While Section 255 charges the Access Board to develop guidelines, it does not prevent the FCC from adopting its own rules. It is very important that the industry have one set of rules to abide by that do not cause conflict or confusion. Furthermore, while the Access Board may be the most qualified to identify the special problems encountered by those with disabilities, the legislative history referred to by the Access Board in its comments does not elevate the Access Board's role beyond that of a formulator of guidelines. The FCC has the statutory authority, expertise, and opportunity to incorporate these guidelines into the uniform rules and standards it already applies to telecommunications equipment manufacturers.

The Access Board argues that its Guidelines are the one set of clear and uniform rules that should guide telecommunications manufacturers.³ Its comments, however, do not address those situations where its Guidelines are in conflict with current FCC regulations. As Uniden and others pointed out⁴, the standards set forth in the Access Board's Guidelines for persons with hearing disabilities and the effective date of the Access Board's Guidelines are in direct conflict with rules recently adopted by the Commission in its Hearing Aid Compatibility (WAC") proceeding.⁵ Indeed, the Access Board's Guidelines are in direct conflict with the consensus of telephone

³ *Comments of the Architectural and Transportation Barriers Compliance Board* at 2-3. ("Access Board Comments").

⁴ *See, Comments of Uniden* at 3. *See also, Comments of Northern Telecom, Inc.* at 3-4; *Comments of Siemens Business Communication Systems, Inc.*, at 14 and accompanying Appendix.

⁵ *See, 47 C.F.R. § 36.1193.43 (e); Access to Telecommunications Equipment and Services by Persons with Disabilities*, 12 FCC Rcd 10077 at ¶6 (July 11, 1997).

manufacturers who worked for months with the Commission to develop a feasible standard and implementation schedule.

If the Access Board's Guidelines are adopted by the Commission without change, **conflicts**, such as the HAC example above, would have the potential for causing confusion and uncertainty among manufacturers. Adopting the Guidelines without change would also set a precedent compromising the Commission's authority and ability to evaluate and respond to future conflicts that may arise. While the Commission is free to afford the Access Board Guidelines substantial weight, the Commission must also be free to interpret the Guidelines and formulate its own substantive rules.

MARKET AND COST RECOVERY FACTORS SHOULD BE CONSIDERED WITHIN THE FCC'S "READILY ACHIEVABLE" ANALYSIS

Most commentators representing those with disabilities demand that the Commission should not consider market and cost recovery issues when analyzing whether a certain accessibility feature is "readily achievable." In making this argument, however, these commentators ignore the dynamic nature of the telecommunications industry. As the Commission stated in the NPRM, "[g]iven the differences between architectural barriers and telecommunications barriers, it is our tentative view that the [Americans with Disabilities Act ("ADA")] factors should guide, though not constrain, our development of factors that more meaningfully reflect pertinent issues and considerations relevant to telecommunications equipment and services."⁶

⁶ *NPRM*, FCC 98-55, at ¶ 98 and Note 198.

Uniden agrees with the Commission's conclusion on this point. While cost recovery and marketing considerations may not normally be permitted under an ADA "readily achievable" analysis, that legislation applies primarily to access to buildings and rights of way-- not product design. Because millions of telecommunications products are manufactured and sold every year in daily commerce, and because the legislation will forever **affect** the design and manufacturing processes of companies who make and sell these products to the general public, cost and marketing issues become extremely relevant and thus necessary to the analysis.

Despite the Access Board's dire prediction that the consideration of these additional factors would "make the already low 'readily achievable' standard even **lower**,"⁷ consideration of these factors is consistent within the statutory meaning of the "readily achievable" standard as "easily accomplishable and able to be carried out without much difficulty and expense".* Consideration of these factors is simply necessary for any serious determination of "readily achievable" for access features incorporated into products manufactured and marketed to a consumer public. No substantiation is given by the Access Board or other commentators on how the FCC's standard would actually make this standard "lower" within the context of telecommunications equipment or services.

Because marketing and cost considerations are such relevant factors, Uniden urges the Commission to give appropriate weight to all relevant expenses and costs in its "readily achievable" analysis. Cost recovery is an important consideration for manufacturers in any situation where design and production modifications must be made. Moreover, direct costs,

⁷ *Access Board Comments* at 4

⁸ 42 U.S.C. § 12181 (9).

opportunity costs as well as the costs of compliance must be considered. With intricate and subjective regulations such as these, higher costs necessary to ensure compliance must be considered and evaluated in all circumstances.

Similarly, the readily achievable standard must consider relevant market factors. The FCC should not, however, supplant its judgement in place of business judgement by presuming that accessibility features will automatically make a product more desirable to mass markets. Thus, Uniden urges the Commission to consider the availability of other available products as satisfaction of its readily achievable test and to consider adoption of a “product-line” approach as set forth by the comments of CEMA, Motorola, and TIA instead of applying the standard to *every* product.⁹

Although the Commission has stated that it will not allow manufacturers to by-pass the readily achievable test simply because another product is available,” the fact that one company may develop a certain accessibility feature is no reason to believe that others can necessarily develop and manufacture its functional equivalent.” Moreover, access features may sometimes be more easily incorporated into one product where to do so in another functionally similar product, would be impossible. As one commentor noted, the Commission cannot presume “that

⁹ See, *Comments of Motorola 6-21; Comments of Consumer Electronics Manufacturers Association (“CEMA”) at 13; Comments of Telecommunications Industry Association (“TIA”) at 17-19.*

¹⁰ *NPRM*, FCC 98-55, at ¶ 168.

¹¹ See, *Comments of Multimedia Telecommunications Association at II.*

accessibility for one product is readily achievable simply because accessibility for a functionally similar product is readily achievable.”

Not all products can be equipped with all the features necessary to afford accessibility to everyone-- in fact, it may be impossible to make a given product universally accessible. As previously stated, the FCC should not assume that accessibility features will automatically make a product more desirable to a mass market as it is ill equipped to make such assumptions. Instead, manufacturers should be allowed to market to demand on a product by product basis.

In addition, many manufacturers market-test their equipment in the marketplace. Many times it is only when a product has been released in the marketplace that solutions and refinements to its features become apparent-either through customer suggestions or refinements made by third parties. The Commission should not adopt a standard that would eliminate market testing as a valuable product development tool. Requiring companies to overanalyze whether a product is accessible and whether certain technology is readily achievable will stifle this innovation and have a chilling effect on the development of new products.¹³

¹² See, *Comments of BellSouth* at 12.

¹³ See also, *Comments of Motorola* at IO- 17

**MANY COMMENTORS AGREE WITH UNIDEN THAT
THE COMMISSION'S PROPOSED COMPLAINT PROCESS SHOULD BE REFINED**

There is broad support for the idea, as the Commission first enunciated, that the initial phase of the Commission's complaint process should be **non-adversarial**.¹⁴ Moreover, there is even greater support to extend the proposed five day response period to at least 30 days as Uniden proposed in its original **comments**.¹⁵ Uniden urges the Commission to re-examine its goals for this procedure and consider the possibility that the fast-track procedure be eliminated altogether in favor of a requirement that consumers and manufacturers attempt to resolve accessibility problems between themselves before burdening the Commission's **resources**.¹⁶

Uniden also renews its call for procedural safeguards such as a requirement that complainants have standing. Uniden proposes that a complainant be qualified as a customer who's disability raises questions of the accessibility of the desired product. Only in this way can the Commission ensure against frivolous claims and an abuse of process. Furthermore, the Commission must ensure that any confidential information required during a complaint process be protected **from** disclosure. Uniden supports CEMA's position that such information should only be conditionally available to parties involved in the complaint if it is demonstrated that a particular need of a particular disabled person or persons is not capable of being met by products available in the marketplace -- and then disclosed only if it is necessary to a Commission determination of

¹⁴ See e.g., *Id*; *Comments of Bell Atlantic*; *Comments of Bell South*; *Comments of Phillips Consumer Communications, L.P.*; *Comments of Northern Telecom, Inc.*; *Comments of TIA*.

¹⁵ See e.g., *Comments of CEMA*; *Comments of GTE*; *Comments of PCIA*; *Comments of Lucent Technologies, Inc.*, *Comments of USTA*; *Comments of Telecommunications for the Deaf, Inc.*

¹⁶ See, *Comments of BellSouth* at 10- 11; *Comments of G TE* at 10.

“readily achievable”.¹⁷ As CEMA notes in its comments, this situation also highlights the need for stringent standing requirements.” Standing is an especially important safeguard where parties that are potential competitors would stand to gain from disclosure of confidential information!

DAMAGES ARE NOT AN APPROPRIATE REMEDY UNDER THE COMMUNICATIONS ACT

Those commentators who addressed whether the Commission has the authority to impose damages agreed with Uniden that Sections 207 and 208 do not permit the Commission to impose damages on non-common carriers.¹⁹ Uniden agrees with CEMA that the only proper penalties are the issuance of declaratory rulings and cease and desist orders against manufacturers or forfeiture proceedings against Commission licensees and authorization holders.

CONCLUSION

As a manufacturer of telecommunications equipment, Uniden is committed to improving access to all of its customers, especially those with disabilities. Uniden believes, however, that the rules meant to ensure access must recognize the circumstances under which many manufacturers operate. Accordingly, Uniden generally supports the Commission’s authority to formulate its own rules, based on the Access Board’s Guidelines, but with the interests of certainty and uniformity clearly in mind. Uniden also encourages the Commission to consider thoughtfully all

¹⁷ *See, Comments of CEMA* at 24.


¹⁸ *Id* ; *See also, Comments of TIA* at 89-80

¹⁹ *Id*; *See also, Comments of Uniden* at 8-10.

cost and market considerations in its "readily achievable" analysis and renews its call for more reasonable and effective complaint procedures. Moreover, Uniden asks the Commission to recognize its limits in imposing damages as a remedy of any kind in these types of complaint proceedings.

Respectfully submitted,

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August 14, 1998

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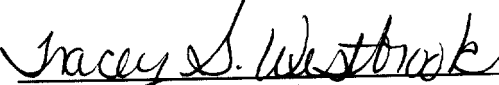
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